

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: JOSEPH EARL KAMLER,	:	CHAPTER 13
Debtor	:	
	:	
JACK N. ZAHAROPOULOS,	:	
STANDING CHAPTER 13 TRUSTEE,	:	
Movant	:	
	:	
JOSEPH EARL KAMLER,	:	
Respondent	:	CASE NO. 1-19-bk-02259-HWV

TRUSTEE'S OBJECTION TO THIRD AMENDED CHAPTER 13 PLAN

AND NOW, this 3<sup>rd</sup> day of December, 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, who objects to the confirmation of the above-referenced Debtor's Plan for the following reason:

1. The Trustee avers that the Debtor's Plan is not feasible based upon the following:
- a. The Plan is ambiguous regarding the base amount.

WHEREFORE, the Trustee alleges and avers that the Debtor's Plan cannot be confirmed, and therefore, the Trustee prays that this Honorable Court will:

- a. deny confirmation of the Debtor's Plan;
- b. dismiss or convert the Debtor's case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/Douglas R. Roeder  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 3<sup>rd</sup> day of December, 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Kara K. Gendron, Esquire  
Mott & Gendron Law  
125 State Street  
Harrisburg, PA 17101

/s/Derek M. Stroupbauer  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee